

**BIS**

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April 8, 2021

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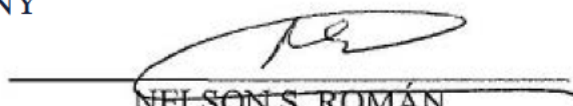
Letter Motion via ECF

Hon. Judge Nelson S. Roman  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, N. Y. 10601.

Plaintiff's application is GRANTED. The parties' deadline to submit a case management plan is held in abeyance pending service of the additional defendant, Gino Secchiano, and Defendant Secchiano's answer or other response to the Amended Complaint. The Clerk of the Court is kindly directed to terminate the motion at ECF No. 14.

Dated: April 9, 2021  
White Plains, NY

SO ORDERED:

  
NELSON S. ROMAN  
United States District Judge

Re: Trustees of Laborers International Union of North America Local 235  
Fringe Benefit Funds and the Laborers International Union of North  
America Local 235 v. M.V.M. Construction, LLC (20-cv 10830 (NSR))(ICM)

Dear Honorable Judge Roman:

We represent the Plaintiff in the above captioned matter. On March 25, 2021 Defendant M.V.M. Construction, LLC filed an Answer in the above captioned matter. On March 26, 2021 Your Honor directed the parties to submit a Case Management Plan and Scheduling Order to the Court by April 9, 2021.

Today Plaintiff filed an Amended Complaint in this matter, adding an additional defendant. We respectfully request that Your Honor's Order of March 26, 2021 be amended to allow time for the new defendant to be joined. Defendant M.V.M. Construction, LLC consented to this request.

Thank you for your attention and courtesies in this matter.

Sincerely,

Michele Joy Harari  
Michele Joy Harari, Esq.

USDC SDNY  
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MEMO ENDORSED